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SUPREME COURT
STATE OF WASHINGTON
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In re the Welfare of A.W. and M.W.,)	No. 90393-0
)	
STATE OF WASHINGTON/DSHS,)	
)	STATEMENT OF
Respondent,)	ADDITIONAL
)	AUTHORITY
vs.)	
)	
T.P.,)	
)	
Appellant.)	

Pursuant to RAP 10.8, appellant cites to the following case on the issue of manifest constitutional error.

State v. O'Hara, 167 Wn.2d 91, 101, 217 P.3d 756 (2009)
(instructional errors that have been held to constitute manifest constitutional error include shifting the burden of proof to the defendant and failing to define the beyond a reasonable doubt standard) (citations omitted).

Dated this 22nd day of October, 2014.

Respectfully submitted,

NELSEN, BROMAN & KOCH
Dana M. Nelson

DANA M. NELSON, WSBA 28239
Office ID No. 91051
Attorneys for Appellant



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Attached for filing today is a statement of additional authority for the case referenced below.

In re Dependency of A.W. & M.W.

No. 90393-0

Statement of Additional Authority

Filed By:
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